

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In Re: ) In Proceedings Under Chapter 7  
 ) Hon. Charles E. Rendlen, III  
Timothy and Karen Pace )  
Debtors. ) Case No. 09-46513  
 )  
 )  
 )  
 ) **MOTION TO EXTEND TIME**  
 ) **TO FILE COMPLAINT TO OBJECT**  
 ) **TO DEBTOR' S DISCHARGE OR TO**  
 ) **DISCHARGEABILITY OF DEBT**  
 )  
 )  
 ) Norman W. Pressman  
 ) Goldstein & Pressman, P.C.  
 ) 121 Hunter Ave., Suite 101  
 ) St. Louis, MO 63124-2082  
 ) (314) 727-1447 (fax)  
 ) (314) 727-1717  
 ) [nwp@goldsteinpressman.com](mailto:nwp@goldsteinpressman.com)

Comes now Dr. Van Steed, Innovision Products, Inc. and Mobile Innovision Products, Inc. creditors and parties in interest in the above-captioned proceedings (" Movants" ), by and through their undersigned counsel, and for their ***Motion to Extend Time to File Complaint to Object to Debtors' Discharge or to Dischargeability of Debt*** (the " Motion" ) states as follows:

1. The Court has jurisdiction in regard to this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Timothy and Karen Pace (" Debtors" ) filed for relief under Chapter 7 of the United States Bankruptcy Code on July 8, 2009.

3. September 29, 2009 is the initial deadline for filing Complaints to Determine Dischargeability of Indebtedness pursuant to 11 U.S.C. §523, or Objections

to Discharge pursuant to 11 U.S.C. §727.

4. Movants' counsel has scheduled an examination of Debtor Timothy Pace pursuant to Rule 2004 by consent to determine if Debtors<sup>1</sup>' obligations to Movant should be excepted from discharge.

5. Movants have not previously requested the relief requested herein and do not make this request for an improper purpose and represent to the Court that Movant's Counsel consents to the relief sought here and has requested that he so notify the Court after the filing of this motion.

WHEREFORE, Movants request that the deadline for filing a Complaint to Determine Dischargeability of Indebtedness, and/or an Objection to Discharge be extended to December 1, 2009. with such other and further relief as the Court deems just and proper.

**GOLDSTEIN & PRESSMAN, P.C.**

By: /s/ Norman W. Pressman

Norman W. Pressman (ARN 4095, MBE 23900)  
121 Hunter Avenue, Suite 101  
St. Louis, MO 63124-2082  
FAX: (314) 727-1447  
(314) 727-1717  
[rab@goldsteinpressman.com](mailto:rab@goldsteinpressman.com)

Attorneys for Movant

---

<sup>1</sup>The examination is currently for Debtor Timothy Pace only but the request for extension is as to both Debtors.

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served this 8<sup>th</sup> day of September, 2009, by first-class, postage prepaid, to the following parties, unless said parties received service by electronic means:

Office of U.S. Trustee  
111 South Tenth Street  
Suite 6353  
St. Louis, MO 63102

Copeland, Thompson & Farris, P.C.  
Charles W. Riske  
231 S. Bemiston, Suite 1220  
Clayton, MO 63105

/s/ Norman W. Pressman